

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
RICHARD HORACE COLE, JR.	:	CASE NO. 1:22-bk-01049-HWV
SHARI W. COLE	:	
Debtors	:	
	:	CHAPTER 13
GLOBAL LENDING SERVICES LLC	:	
Movant	:	
	:	
v.	:	
	:	
RICHARD HORACE COLE, JR.	:	
SHARI W. COLE	:	
Respondents	:	

**DEBTORS' RESPONSE TO MOTION OF  
GLOBAL LENDING SERVICES LLC  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come Debtors, Richard Horace Cole, Jr. and Shari W. Cole, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

**THE PARTIES**

1. Admitted.
2. Admitted.

**JURISDICTION AND VENUE**

3. Admitted.

**FACTUAL BACKGROUND**

4. Admitted.
- 6(sic). Admitted in part and denied in part. The Contract speaks for itself. Strict proof is demanded.
7. Admitted in part and denied in part. The Certificate of Title was not attached as Exhibit "B".

8. Admitted. Debtors will make an offer to bring the arrearage current in the near future.

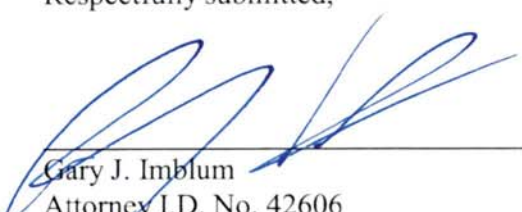
9. Admitted in part and denied in part. Debtors have no knowledge on the gross balance due on the Contract. Strict proof is demanded.

10. Admitted in part and denied in part. Movant states the low auction value of the value of the vehicle. Debtors believe and hereby aver that the fair market value of the vehicle is \$14,744.00 as set forth on Schedule B of Debtors' bankruptcy Schedules.

12(sic). Denied. There is an equity cushion of \$2,363.07 which is about 16% of the fair market value of the vehicle. Further, Debtors will make an offer in the near future to bring the arrears current.

**WHEREFORE**, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum  
Attorney I.D. No. 42606  
4615 Derry Street  
Harrisburg, PA 17111  
(717) 238-5250  
Fax No. (717) 558-8990  
gary.imblum@imblumlaw.com  
Attorney for Debtors

DATED: 11-23-22

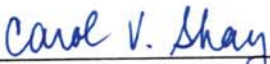
**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF GLOBAL LENDING SERVICES LLC FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

KERI P. EBECK, ESQUIRE  
BERNSTEIN-BURKLEY, P.C.  
COUNSEL FOR MOVANT  
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

  
\_\_\_\_\_  
Carol V. Shay, Paralegal  
4615 Derry Street  
Harrisburg, PA 17111  
(717) 238-5250  
Fax No. (717) 558-8990  
gary.imblum@imblumlaw.com  
For Debtors

DATED: 11/23/2022